

Missouri Computer Tampering Act ("MCTA"), RSMo. 569.097 (Count III), and the common laws of conversion (Count II), negligence (Count IV), and negligence per se (Count V).

4. TCPA claims are federal question claims pursuant to 28 U.S.C. §1331, and federal courts have original jurisdiction over such claims.

5. This action is removable to the United States District Court for the Western District of Missouri, Western Division, pursuant to 28 U.S.C. §1441 and Local Rule 3.1, which provide that any civil action brought in a state court for which the district courts of the United States have original jurisdiction may be removed by the defendant to the district court for the United States for the district and division embracing the place where the action is pending. Jackson County is located within the territorial boundary of the Western District, and cases originating in Jackson County, Missouri, are properly venued in the Western Division. L.R. 3.1.

6. The corporate agent was served on April 22, 2015. Therefore, pursuant to 28 U.S.C. §1446(b)(1), this Notice of Removal is timely filed "within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based." 28 U.S.C. §1446(b)(1).

7. In accordance with 28 U.S.C. §1446(d), written notice of the filing of this Notice of Removal will be given to the Plaintiff and will be filed with the Court Administrator for the Circuit Court of Jackson County, State of Missouri, following the filing of this notice, together with a Notice of Filing of Notice of Removal.

8. Eli is contemporaneously filing a Civil Cover Sheet and has paid the required filing fee.

9. Eli has a good and sufficient defense to this action.

WHEREFORE, Defendant Eli Global, LLC requests that the above action now pending against it in the Circuit Court of Jackson County, Missouri be removed to the United States District Court for the Western District of Missouri.

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